

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs

Cr. No. 19-20836
HONORABLE MARK A. GOLDSMITH

RICHARD SOLLARS, et al.,

Defendants.

/

**NOTICES AND DEMANDS IN COMPLIANCE
WITH STANDING ORDER AND FEDERAL RULES**

Defendant Richard Sollars, by his attorneys John A. Shea and Todd F. Flood, provides the following notices and requests in connection with the Superseding Indictment:

1. It is hereby requested that the Government provide forthwith the following information, and where applicable, to provide copies or an opportunity to make copies of:

a. Any information and documents within the meaning of the "Standing Order," paragraph 1(a), and/or Rule 16(a)(1) of the Federal Rules of Criminal Procedure.

b. Any favorable evidence within the meaning of the "Standing Order," paragraph 1(b), and/or *Brady v Maryland*, 373 U.S. 83 (1963), and *Giglio v. United States*, 405 U.S. 150 (1972), including but not limited to:

i. All consideration or promises of consideration given to or on behalf of a witness, or expected or hoped for by a witness.

ii. All threats or coercion made or directed against a witness or persons of concern to the witness, including but not limited to threats of criminal prosecution or investigation, or threats of civil or tax litigation or investigation.

iii. All records or information revealing prior felony convictions, misdemeanor convictions or juvenile adjudications of the Defendant and any witness the Government intends to call at trial.

iv. The existence and identification of each occasion known to the government on which any witness the government intends to call at trial may have testified falsely under oath, or submitted false affidavits in connection with the proceedings of any kind, including but not limited to forfeiture proceedings, or each occasion known to government on which any witness the government intends to call at trial may have made inconsistent statements in connection with this case, and a summary of such inconsistent statements.

c. Any document which will be used to refresh the memory of a witness within the meaning of the "Standing Order," paragraph 8, and/or Rule 612 of the Federal Rules of Evidence.

d. Any statement of witnesses within the meaning of 18 USC 3500(e).

e. Notice of any "other acts" evidence which the Government intends to introduce at trial, pursuant to FRE 404(b)(2).

2. Notice is hereby given pursuant to the "Standing Order," paragraph 5(b), that the foundation for any and all exhibits will be contested, and paragraph 6(b) that the chain of their custody will be contested.

3. Notice is hereby given pursuant to the "Standing Order," paragraph 7, that any scientific analysis or summary testimony by experts will be contested unless there has been a proper basis for the witness' testimony under Rule 1006 of the Federal Rules of Evidence.

4. All requests for information, materials, or evidence contained herein are continuing ones and the government is requested

to immediately provide any additional information, materials, or evidence as required by the "Standing Order," paragraph 3 and/or Rule 16(c) of the Federal of Criminal Procedure.

5. Pursuant to Rule 16(a)(1)(A), Defendant requests disclosure of the substance of any relevant oral statement made by Defendant, before or after arrest, in response to interrogation by a person Defendant knew was a government agent if the government intends to use the statement at trial.

6. Pursuant to Rule 16(a)(1)(B), Defendant requests disclosure of any relevant written or recorded statement by Defendant, the portion of any written record containing the substance of any relevant or oral statement made before or after arrest if Defendant made the statement in response to interrogation by a person Defendant knew was a government agent, and Defendant's recorded testimony before a grand jury relating to the charged offense.

7. Pursuant to Rule 16(a)(1)(D) of the Federal Rules of Criminal Procedure, Defendant requests a copy of his prior criminal record that is within the government's possession, custody or control.

8. Pursuant to Rule 16(a)(1)(E) of the Federal Rules of Criminal Procedure, Defendant requests permission to inspect and to copy or photograph books, papers, documents, data, tangible objects, buildings or places that are within the government's possession,

custody or control and that meet the requirements set forth in the rule.

9. Pursuant to 16(a)(1)(F) of the Federal Rules of Criminal Procedure, Defendant requests permission to inspect and to copy or photograph the results or reports of any physical or mental examination and of any scientific test or experiment that is within the governments possession, custody, or control and that meet the requirements set forth in the rule.

10. Notices contained herein will remain in effect unless expressly withdrawn.

Dated: February 10, 2020

s/John A. Shea
John A. Shea (P37634)
Attorney for Defendant
120 N. Fourth Avenue
Ann Arbor, Michigan 48104
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on February 10, 2020, he electronically filed a copy of Defendant's *Notices and Demands in Compliance with Standing Order*. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

Dated: February 10, 2020

s/John A. Shea
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